

## United States District Court

AUG - 8 2017

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

Andre C. Joseph

## CRIMINAL COMPLAINT

Case Number: M-17- 1390-M

YOB: 1965

COC: Trinidad and Tobago

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about August 7, 2017 in Hidalgo County, in the Southern District of Texas defendant(s) did,

being then and there an alien, who had been previously **deported/removed** from the United States in pursuance of law did therefore knowingly, willfully and in violation of law attempt to gain illegal entry into the United States, the Attorney General of the United States and/or the Secretary of Homeland Security, not therefore having consented to a re-application by the defendant for admission into the United States,

in violation of Title 8 United States Code, Section(s) 1326

I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to enter the United States illegally at the Pharr, Texas Port of Entry by declaring himself a United States citizen. He was referred into secondary for further inspection. Database queries revealed the defendant was not a United States citizen but rather a citizen of Trinidad and Tobago. Database queries revealed the defendant was previously convicted of bank robbery and sentenced to 95 months confinement. He was removed to Trinidad and Tobago on 03/25/2015 from Houston, Texas. Records show no evidence exists of the defendant having obtained permission from the United States Attorney General or the Secretary of Homeland Security to re-enter the United States.

Continued on the attached sheet and made a part of this complaint:

☐ Yes☒ No

Sworn to before me and subscribed in my presence,

Approved By: **R. Cantu**

August 8, 2017

Date

**Peter E. Ormsby****U.S. Magistrate Judge**

Name and Title of Judicial Officer

Signature of Complainant

**Nidia Trevino**

Printed Name of Complainant

**McAllen, Texas**

City and State

Signature of Judicial Officer